

# **EXHIBIT 35**

**DECLARATION OF BERNARD ARULANANDAM**

I, Bernard Arulanandam, declare as follows:

1. I am the Vice Provost for Research at the Trustees of Tufts College (“Tufts University” or “Tufts”) in Boston, Massachusetts. I have held that position since July 2022. Before that, I oversaw research and economic development work within the University of Texas System, at the University of Texas at San Antonio. As a federally funded researcher for over 25 years, I can attest to the crucial role of indirect funds in supporting the infrastructure and broader research operations at universities, which go beyond the direct costs associated with research itself.
2. As the Vice Provost for Research, I have personal knowledge of the contents of this declaration or have knowledge of the matters based on my review of information and records gathered by Tufts University personnel and could testify thereto.
3. Tufts University receives substantial annual funding from the National Science Foundation (“NSF”). As of fiscal year 2025, the NSF is obligated to fund Tufts University an aggregate of \$62.7 million for Tufts’ current projects, comprising \$44.4 million in direct costs and \$18.3 million in indirect costs. These obligated funds support over 150 active projects across the University.
4. Tufts University unites the resources and expertise of its Schools of Engineering, Arts and Sciences, and researchers from across the University to support the national mission of the NSF. These nationally recognized research assets rely on federal support to advance vital, cutting-edge research that benefits millions of Americans. For example:

- a. Tufts' materials research, led by the Tufts Interdisciplinary Advanced Materials Center (TIAMAT), brings together NSF-funded researchers to conduct novel and highly innovative work that advances both basic and applied materials science. The program focuses on areas critical to maintaining American competitiveness in materials innovation and has already produced impactful advances, including nano-enabled membranes for water treatment, nanostructured components for next-generation electronic devices, and computational materials science aimed at enhancing storage capacity.
  - b. In addition to materials science, Tufts University leads a range of research efforts in quantum computing and resilient infrastructure, emphasizing innovation from the molecular to the macro scale. Tufts' current NSF-funded research includes the creation of 3D printable, cost-effective robots able to be built and deployed at scale, and research to ensure that AI technology meets its promise. Our researchers work on technological and engineering solutions that can have a direct effect on American competitiveness in the global economy.
5. Tufts intends to apply for new NSF funding awards, and renewals and continuations of existing funding awards, in the future.
6. Indirect costs are essential for supporting this research. The NSF's proposal to cut indirect cost rates to 15% would preclude carrying out the kinds of research projects described in paragraph 4 in the future.

7. Indirect costs are leveraged to construct and maintain state-of-the-art facilities required to meet the current technical requirements for advanced research, as well as the procurement of equipment necessary to conduct basic and applied research.
8. If indirect cost reimbursements on federally funded research were cut, several tangible impacts would occur across Tufts University, its laboratories, and research infrastructure. Key consequences include underutilized or abandoned laboratories and facilities, delayed or canceled infrastructure upgrades, and the loss of collaborative spaces essential for research and training.
9. More concerning, cuts to indirect cost support could reduce equipment maintenance capabilities, potentially leading to safety risks in high-tech or hazardous research environments. Safety functions are often among the first areas affected when faced with fiscal constraints, leading to significant risks. Reductions in indirect costs may compromise environmental health and safety staffing, delay inspections, limit access to proper training for laboratory personnel, and hinder maintenance of essential safety equipment such as fume hoods, chemical safety infrastructure, and emergency response systems. These cuts not only endanger the health and well-being of researchers, staff, and students, but also increase the risk of regulatory noncompliance, accidents, and hazardous material exposure—threatening both the continuity and credibility of the institution’s research enterprise.
10. In addition, indirect costs support the administration and oversight of federally sponsored grants and contracts, much of which is required by federal regulations. Cutting indirect cost support may result in increasing several compliance risks that

could impact the integrity, sustainability, and legality of research programs. These mandates serve many important functions, including ensuring research integrity; properly managing and disposing of chemical and biological agents used in research; preventing financial conflicts of interest; managing funds; preventing technology and national security expertise from being inappropriately accessed by foreign adversaries; and providing the high-level cybersecurity, data storage, and computing environments mandated for regulated data.

11. Recovery of Tufts' indirect costs is based on predetermined rates that have been contractually negotiated with the federal government. Through fiscal year 2025, the predetermined indirect cost rates are 58% for the Tufts' Medford/Somerville campus schools and 65% for its health science campuses, which were agreed upon as of December 16, 2022.
12. In fiscal year 2025, Tufts expects to receive \$27.2 million in NSF support, including \$19.7 million in direct costs and \$7.5 million in indirect costs. If NSF grant activity remains at this level, reducing the indirect cost rate to 15% would lead to an annual loss of approximately \$4.7 million. This reduction would significantly impact Tufts' ability to sustain essential research operations, such as administrative support, compliance, facilities, and other critical infrastructure required to manage federally funded research.
13. This sharp reduction would significantly hinder Tufts' ability to support the administrative and operational infrastructure necessary to enable high-impact research, including compliance, facilities, grant management, and research

personnel support. The effects would jeopardize the long-term sustainability of the University's research enterprise.

14. This reduction in indirect cost reimbursement would necessarily and immediately result in staffing reductions across the board. For example: Tufts University's Institutional Review Board (IRB) is responsible for the oversight of all research involving human subjects, ensuring both ethical standards and the protection of participants' privacy. Without sufficient support through indirect cost recovery, the University may be forced to reduce IRB staffing. Such reductions would have a negative effect on the IRB's capacity to review and approve research protocols in a timely manner, resulting in significant delays to critical research—potentially including NSF-funded projects involving human subjects.
15. Tufts University has for decades relied on the payment of indirect costs. And until now, we have been able to rely on the well-established process for negotiating indirect cost rates with the government to inform our budgeting and planning. Operating budgets rely on an estimate of both direct and indirect sponsored funding to plan for annual staffing needs (*e.g.*, post-docs, PhD students, and other research staff), infrastructure support (*e.g.*, IT networks, regulatory compliance, and grant management support), and facility and equipment purchases.
16. Tufts University carries long-term institutional commitments—such as support for tenured faculty, laboratory and technical staff, equipment, and facility maintenance contracts—that represent fixed, non-negotiable costs. Tufts University relies on budgeted grant funding, including indirect cost recovery, to meet these obligations and sustain its research infrastructure.

17. According to the Tufts University 2024 Economic and Community Impact Report, Tufts generated \$112.1 million in tax revenue and supported 12,904 jobs in New England in 2023. Disruptions to Tufts University's research funding, such as an indirect cost rate reduction to 15%, would directly result in reduced tax revenue and employment opportunities at the local and state level, with downstream effects on the number of scientists and engineers that are trained and deployed into the U.S. innovation ecosystem.

18. Finally, slowdowns or halts in research by Tufts University and other American universities would allow competitor nations that are maintaining their investments in research to surpass the United States on this front, threatening both our Nation's scientific leadership and its economic dominance.

19. Tufts cannot cover the funding gap itself. While Tufts maintains an endowment, it is neither feasible nor sustainable for Tufts to use endowment funds or other revenue sources to offset shortfalls in indirect cost recovery, for several reasons:

- a. Much of the University's endowment is restricted to specific donor-designated purposes, such as scholarships, faculty chairs, and academic programs. Tufts is not legally permitted to use those funds to cover research infrastructure costs.
- b. Even the portion of the endowment that is unrestricted is subject to a carefully managed annual payout to ensure long-term financial stability for the institution.
- c. As a non-profit institution, Tufts reinvests nearly all its revenue into mission-critical activities, leaving little margin to absorb unexpected

funding gaps. In other words, unlike for-profit organizations, Tufts does not generate significant surpluses that could be redirected without impacting core academic priorities such as educational programs and financial aid support for students.

- d. Moreover, absorbing the cost of a lower indirect cost rate, even if it were possible, would create long-term budget pressures on Tufts University—which would in turn force reductions in key investments supporting Tufts’ faculty, students, staff, research, and teaching infrastructure, as well as other critical activities needed to maintain Tufts’ academic excellence.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 5, 2025, at 75 Kneeland Street, Boston, Massachusetts.

A handwritten signature in black ink, appearing to read 'ABenz' with a long horizontal stroke extending to the right.

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Bernard Arulanandam